



JUN 17 2019

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NEW YORK LIFE INSURANCE COMPANY

Plaintiff,

v.

BRANDON GUNWALL, JEFFREY E.
SWENSON and AMEILA M. BESOLA, as
administratrix of the Estate OF Mark Lester Besola,

Defendants.

NO. 2:19-CV-00226

DEFENDANT'S ANSWER TO
PLAINTIFF'S COMPLAINT

DEFENDANT'S ANSWER TO PLAINTIFF'S COMPLAINT

Answering Defendant, Jeffrey Swenson, hereby answers to the allegations of Plaintiff's Complaint,
states as follows:

THE PARTIES

1. Defendant lacks information to admit or deny the allegations contained in paragraph one of the Complaint.
2. Defendant lacks information to admit or deny the allegations contained in paragraph two of the Complaint.
3. Admitted.

- 1 4. Defendant lacks information to admit or deny the allegations contained in paragraph four of the
2 Complaint.

3
4 **JURISDICTION AND VENUE**

- 5 5. Defendant lacks information to admit or deny the allegations contained in paragraph five of the
6 Complaint.
7
8 6. Defendant lacks information to admit or deny the allegations contained in paragraph six of the
9 Complaint.

10
11 **CAUSE OF ACTION IN INTERPLEADER**

- 12 7. Defendant lacks information to admit or deny the allegations contained in paragraph seven of the
13 Complaint.
14 8. Defendant lacks information to admit or deny the allegations contained in paragraph eight of the
15 Complaint.
16 9. Defendant lacks information to admit or deny the allegations contained in paragraph nine of the
17 Complaint.
18 10. Defendant lacks information to admit or deny the allegations contained in paragraph ten of the
19 Complaint.
20
21 11. Admitted.
22
23 12. Admitted.
24 13. Denied. The October 15, 2018 beneficiary change was the result of coercion and undue
25 influence, as such, it is not valid, and Answering Defendant is the proper beneficiary.
26 14. Admitted.
27
28 15. Admitted.

1
2 16. Admitted.

3 17. Defendant lacks information to admit or deny the allegations contained in paragraph seventeen
4 of the Complaint.

5 18. Defendant lacks information to admit or deny the allegations contained in paragraph eighteen of
6 the complaint.

7
8 19. Admitted.

9 20. Defendant lacks information to admit or deny the allegations contained in paragraph twenty of
10 the Complaint.

11 21. Defendant lacks information to admit or deny the allegations contained in paragraph twenty-one
12 of the Complaint.

13
14 22. Admitted.

15 23. Defendant lacks information to admit or deny the allegations contained in paragraph twenty-
16 three of the Complaint.

17
18 24. Admitted.

19 25. Defendant lacks information to admit or deny the allegations contained in paragraph twenty-five
20 of the Complaint.

1
2 **WHEREFORE**, Defendant Swenson seeks:

- 3 A. Dismissal of Plaintiff's Complaint;
4
5 B. Payment of the death benefit equal to \$695,000;
6
7 C. All applicable interest on the death benefit under this policy;
8
9 D. Reimbursement of fees and costs; and
10 E. Any additional damages as this court sees as just and proper.

11
12 Dated this 6 day of June 2019.

13 Respectfully submitted,

14 

15 Jeffrey Swenson
16 410 N. Washington street Apt. #1
17 Aberdeen, WA 98520
18 Tel: 360-500-8671
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28

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Aberdeen, WA 98520

U.S. District Court
Clerk's Office
700 Stewart Street, Suite 2310
Seattle, WA 98101

FILED
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